10-29-92
Seattle 12.3.8 v.6

Ash Grove Cement Company/Western Region

Interoffice Memorandum October 29, 1992

To: Ken Rone

From: Hans E. Steuch

Subject: Disposal of plant waste

Route to: SES, DYH

As we have discussed, regulations should allow us to dispose of plant waste in the process without further permitting or reporting. Oily compressor water, plant grease and waste oil have been mentioned as candidates for disposal. There are other candidates for in-process disposal, so I'll broaden the categories to:

* Liquid (pumpable) waste with no energy content (example: oily compressor water).
* Liquid (pumpable) waste with energy content (example: crankcase waste oil).
* Solid waste with energy content (example: waste grease, small filters).

Liquid (pumpable) waste with no energy content I propose it is collected in 55 gallon drums filled 2/3 and disposed of by injecting the liquid into the roller mill while it is in operation. The 55 gallon drums will be located at the base of the mill and a compressed air aspiration pod stuck into the drum that sucks the liquid out in a period of 5 to 10 minutes (sufficiently slow to not upset the mill) and blows it into the mill.

Liquid (pumpable) waste with energy content A method of collection and storage should be devised. This would include considerations about maximum particle size, filtering/pumping needs for ultimate injection into the calciner or the kiln riser.

Solid waste with energy content These can be disposed of in the kiln riser. I have thought of two slightly different methods of introducing the waste. One would utilize one of the two existing inclined, covered clean out boxes on the west side of the kiln riser. The other would require the installation of a refractory lined circa 12 inch diameter pipe on the level below the inclined boxes (near the air blasters). The attached sketches illustrate these two alternatives and the attached table summarizes the pro's and con's of each.

Other The wastes and in-plant disposal methods for wastes discussed above cover only a portion of the total universe of plant wastes. Nate Fernow has explained to me how you have set up to recycle many other wastes. It might prove useful to document this. An example of documenting a comprehensive approach to waste handling is provided by the attached document developed at the Durkee plant.